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Attorneys for Plaintiffs Jane Doe I, et. al.

IN THE UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

JANE DOE I, *et al.*,

Plaintiffs,

v.

LAKIREDDY BALI REDDY, *et al.*,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAKIREDDY BALI REDDY, VIJAY KUMAR  
 LAKIREDDY, PRASAD LAKIREDDY,  
 JAYAPRAKASH LAKIREDDY AND  
 ANNAPURNA LAKIREDDY,

Defendants.

No. C-02-5570 VRW

No. CR-00-40028 CW

**PLAINTIFFS' JOINDER IN  
 NOTICE OF RELATED CASE**

Plaintiffs Jane Doe I, *et al.* hereby join in the Notice of Related or Pending Cases filed by defendants Lakireddy Bali Reddy *et al.* on November 22, 2002 in *Jane Doe I, et al v. Lakireddy Bali Reddy, et al.*, Case No. C-02-5570 VRW. For the reasons stated in defendants' Notice and for the following additional reasons, that civil class action, which has been assigned to U.S. District Court Judge Vaughn Walker, is related to *United States v. Lakireddy Bali Reddy, Vijay Kumar Lakireddy, Prasad Lakireddy, Jayaprakash Lakireddy and Annapurna Lakireddy*, CR-00-40028 CW, now pending in the United States District Court for the Northern District of California, Oakland Division before U.S. District Court Judge Claudia Wilken.

1 Civil case defendants Lakireddy Bali Reddy, Vijay Kumar Lakireddy, Prasad Lakireddy  
2 and Jayaprakash Lakireddy are also defendants in the Reddy criminal actions. Although the  
3 civil action also names additional co-conspirator defendants, each of those additional defendants  
4 is either a close family member of one of the criminal case defendants or is a Reddy family-  
5 owned business which is alleged to have profited unlawfully from the overlapping criminal and  
6 civil case allegations of wrongdoing. In addition, each of the individual plaintiffs in this civil  
7 case was a victim of the criminal schemes alleged in the criminal case and is a potential witness  
8 in the upcoming criminal trial of defendant Prasad Lakireddy.

9 The civil case and the criminal case involve overlapping factual and legal allegations,  
10 including RICO allegations that the criminal defendants and others engaged in an unlawful  
11 conspiracy to bring Indian nationals to the United States, that defendants employed and  
12 exploited such Indian nationals, and that defendants engaged in sexual intercourse with minor  
13 Indian nationals.

14 The proceedings in the civil case will be closely related to the criminal case proceedings  
15 in several respects. In particular, because of the pendency of the criminal trial against defendant  
16 Prasad Lakireddy (who has retained separate counsel from the other Reddy defendants in the  
17 civil action), the scope and timing of discovery in the civil case will have to be coordinated both  
18 with the criminal prosecutor (who plaintiffs understand does not want civil discovery of  
19 plaintiffs to go forward that would not otherwise be available before a criminal trial) and with  
20 the criminal defendants (who have stated that they intend to assert a Fifth Amendment privilege  
21 to avoid responding to discovery until all criminal proceedings are finally resolved – including  
22 defendant Lakireddy Bali Reddy's pending motion for sentence reduction). In addition,  
23 plaintiffs in the civil case – many of whom are potential witnesses in the criminal case – have  
24 significant privacy and confidentiality concerns that should be resolved consistently in the two  
25 cases.

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1 For these reasons, plaintiffs agree with defendants that the cases are related, and  
2 plaintiffs believe that assignment of the civil class action litigation to the same judge as is  
3 presiding over the criminal proceedings is just and proper, will further judicial economy, and  
4 will promote an efficient determination of both actions.

5  
6 Dated: November 26, 2002

MICHAEL RUBIN  
SCOTT A. KRONLAND  
REBEKAH B. EVENSON  
Altshuler, Berzon, Nussbaum, Rubin & Demain

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9 By: /s/\_\_\_\_\_  
10 Scott A. Kronland  
Attorneys for Plaintiffs Jane Doe I, et. al.

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**PROOF OF SERVICE**

Code of Civil Procedure §1013

**CASE:** Jane Doe I, et al. v. Lakireddy Bali Reddy, et al.,**CASE NO:** United States District Court, Northern District of California,  
Case No. C-02-5570

I am employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to the within action; my business address is 177 Post Street, Suite 300, San Francisco, California 94108. On November 26, 2002, I served the following document (copy attached):

**PLAINTIFFS' JOINDER IN NOTICE OF RELATED CASE**

on the parties, through their attorneys of record, by placing true copies thereof in sealed envelopes addressed as shown below for service as designated below:

A. By First Class Mail: I am readily familiar with the practice of Altshuler, Berzon for the collection and processing of correspondence for mailing with the United States Postal Service. I caused each such envelope, with first-class postage thereon fully prepaid, to be deposited in a recognized place of deposit of the U.S. Mail in San Francisco, California, for collection and mailing to the office of the addressee on the date shown herein.

**ADDRESSEE****PARTY**

A	William S. Berland Ferguson & Berland 1816 Fifth Street Berkeley, CA 94710-1915	Defendants
A	Michael W. Bolechowski 2000 Powell Street, Suite 1425 Emeryville, CA 94608	Defendants
A	Jonathan Bass Corblentz, Patch, Duffy & Bass 222 Kearny Street, 7th Floor San Francisco, CA 94108-4510	Defendants
A	George J. Cotsirilos, Jr. Cotsirilos & Campisano 632 Commercial Street, Third Floor San Francisco, CA 94111	Defendant Vijay Kumar Lakireddy
A	Paul D. Wolf Law Offices of Paul Delano Wolf 1212 Broadway, Tenth Floor Oakland, CA 94612	Defendant Prasad Lakireddy
A	Ted W. Cassman Cooper, Arguedas & Cassman 5900 Hollis Street, Suite N Emeryville, CA 94608	Defendant Lakireddy Bali Reddy

1 A Stephen D. Corrigan Plaintiff in Case No. CR-00-  
2 Assistant United States Attorney 40028  
3 1301 Clay Street, Suite 340-S  
4 Oakland, CA 94612-5217

5 I declare under penalty of perjury under the laws of the State of California that the  
6 foregoing is true and correct. Executed this November 26, 2002, at San Francisco, California.

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/s/ Holly Miller